

March 15, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

**Re: D.T.E. 05-86**

Dear Secretary Cottrell:

I am writing on behalf of Bay State Gas Company; The Berkshire Gas Company; Blackstone Gas Company; Boston Edison Company, Cambridge Electric Light Company, and Commonwealth Electric Company d/b/a NSTAR Electric; Fitchburg Gas and Electric Light Company d/b/a Unitil; KeySpan Energy Delivery New England; Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid; New England Gas Company's Fall River and North Attleboro Service Areas; NSTAR Gas Company, and Western Massachusetts Electric Company (collectively "Companies").

By this letter, we are responding to the Department's February 28, 2006 order in the above-captioned docket. In that order, the Department stated its intent to convene a working group of interested parties to establish a method of program evaluation and a reporting schedule for arrearage management programs. (p. 14) Accordingly, the Department directed the Companies to submit proposed criteria for reporting data. (p. 14) The Department intends to evaluate how the amount of forgiveness credits, down payments, and other variables effect the success of an arrearage management program. (p. 14)

We propose to report on the criteria set forth in Attachment #1, as applicable to each of the Companies' arrearage management programs, on an annual basis. We believe that this data will enable the Companies, the Department, and other interested parties to review and evaluate the Companies' arrearage management plans, including how the amount of forgiveness credits, down payments, and other variables effect the success of an arrearage management program. To the extent that any of the Companies have developed particular arrearage management program evaluation methodologies with consumer advocates that may not include each of the criteria proposed in Attachment #1, the Companies encourage the Department to allow such evaluation methodologies to be utilized, consistent with the Department's approval of company-specific arrearage management programs in this proceeding.

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Thank you very much for your time and attention to this matter. We look forward to participating in the working group.

Very truly yours,

A handwritten signature in black ink, reading "Amy G. Rabinowitz". The signature is written in a cursive, flowing style.

Amy G. Rabinowitz

cc: Service List

**Attachment #1**  
**Proposed Annual Reporting Metrics**

Number of customers who enroll in the program in the current year

Number of customers who leave the program in the current year

Number of total customers in the program (includes enrollees from previous year)

Number of customers who successfully complete the program in the current year

Average arrearage amount of current year enrollees

Average arrearage amount as a percentage of the total bill of current year enrollees

Average amount of forgiveness credit in the current year

Total amount of arrears outstanding for all participants at the end of the current year

Total amount of forgiveness credits for the current year

Average amount of down payment for the current year

Percentage of participating customers receiving fuel assistance

Net benefit of program

Net cost of program